

UNITED STATES DISTRICT COURT
OF THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:22-cv-00050-M

MADISON CAWTHORN, an individual,

Plaintiff,

v.

MR. DAMON CIRCOSTA, in his official capacity as Chair of the North Carolina State Board of Elections, MS. STELLA ANDERSON, in her official capacity as a member of the North Carolina State Board of Elections, MR. JEFF CARMON, in his official capacity as a member of the North Carolina State Board of Elections, MR. STACY EGGERS IV, in his official capacity as a member of the North Carolina State Board of Elections, MR. TOMMY TUCKER, in his official capacity as a member of the North Carolina State Board of Elections, MS. KAREN BRINSON BELL, in her official capacity as the Executive Director of the North Carolina State Board of Elections,

Defendants, and

LAUREL ASHTON, MICHAEL “MIKE” HAWKINS, MELINDA LOWRANCE, ELLEN BETH RICHARD, and TERRY LEE NEAL,

Proposed Defendant-Intervenors.

**LAUREL ASHTON, MICHAEL “MIKE” HAWKINS, MELINDA LOWRANCE,
ELLEN BETH RICHARD, and TERRY LEE NEAL’S
EXPEDITED RENEWED MOTION TO INTERVENE AS DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 24, Proposed Defendant-Intervenors Laurel Ashton, Michael “Mike” Hawkins, Melinda Lowrance, Ellen Beth Richard, and Terry Lee Neal

(“Defendant-Intervenors”) respectfully submit this expedited renewed motion, by and through undersigned counsel, to intervene as Defendants in the above-captioned case as of right or, in the alternative, with the Court’s permission.

As set forth in the accompanying memorandum in support of the renewed expedited motion to intervene, Defendant-Intervenors have filed a Notice of Candidacy Challenge in the North Carolina State Board of Elections pursuant to N.C. Gen. Stat. § 163-127.2 in the matter styled *In re Challenge to the Constitutional Qualifications of Rep. Madison Cawthorn* (N.C. State Bd. of Elections) (the “Challenge”). It is therefore Defendant-Intervenors’ Challenge which the Court has enjoined.¹

Proposed Defendant-Intervenors inquired of counsel for Defendants and Plaintiffs on March 17, 2022 concerning their positions regarding this Motion. Counsel for Plaintiff is opposed to this motion; counsel for Defendants have not yet provided their position.

Defendant-Intervenor’s positions are fully stated in their supporting memorandum, filed contemporaneously with this Motion.

This the 17th day of March, 2022.

Respectfully submitted,

/s/ Pressly M. Millen

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¹ If this Court perceives any procedural complications from the fact that Ashton is the only proposed Intervenor who had earlier moved to intervene, the Court should grant her motion notwithstanding any complications pertaining to her fellow Defendant-Intervenors’ motions.

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*Special appearances pursuant to L.R. 83.1